

COMES NOW Texas Democratic Party and Boyd Richie, in his capacity as Chair of the Texas Democratic Party (hereinafter collectively referred to as “TDP”), in the above entitled and numbered cause, and files this Designation of Expert Witnesses, Witness List and Exhibit List and would show this Honorable Court as follows:

I.

PLAINTIFFS' DESIGNATION OF EXPERT WITNESSES

1. Dr. Michael P. McDonald
Associate Professor,
George Mason University Non-Resident Senior Fellow,
Brookings Institution
George Mason University
Dept. of Public and International Affairs
4400 University Drive - 3F4
Fairfax, VA 22030-4444
Witness will testify with regard to the matters described in the attached report.
2. Chad W. Dunn
Brazil & Dunn
4201 FM 1960 West, Suite 530
Houston, Texas
Witness will testify with regard to the reasonableness and necessity of attorney fees at the appropriate time.

II.

SUPPLEMENTATION AND CROSS-DESIGNATION

TDP will designate other experts in accordance with the Court's docket control order and the Federal Rules of Civil Procedure, and therefore, will supplement this response.

TDP hereby cross designates and states that they may call any expert witness identified or designated by any party or any employee or representative of any adverse party, subject to any objections that Intervenor may make concerning the designation or qualifications of those witnesses.

TDP reserves the right to elicit by way of cross examination, opinion testimony from experts or corporate representatives or other witnesses who may be qualified to render expert testimony designated and/or called by other parties to the suit.

TDP reserves the right to elicit by way or direction/cross examination, opinion testimony from fact witnesses who may be qualified to render expert testimony, but are not retained experts at this time, who have expertise in certain areas regarding the facts of this case.

TDP reserves the right to elicit by way of direct/cross examination, opinion testimony for experts designated and/or called by other parties to the suit. TDP reserves the right to call any expert witness of any party who may be added to this lawsuit.

III.

WITNESS LIST

Discovery is still ongoing and TDP reserves the right to call additional witnesses as documents are obtained and reviewed and depositions are completed. TDP also designates Dr. Michael McDonald as a fact witness in so far as he is knowledgeable regarding data and voting patterns.

PERSON	CONTACT INFORMATION	CONNECTION WITH CASE
Congressman Joe Barton	2109 Rayburn Building Washington, DC 20515 or 6001 West Ronald Reagan Memorial Highway, Suite 200 Arlington, Texas 76017 or	Republican Congressman involved in drawing the adopted congressional map

	2106 A W. Ennis Ave. Ennis, Texas 75119 or 303 N. 6th St. Crockett, TX 75835	
Congressman Lamar Smith	2409 Rayburn House Office Building Washington, DC 20515 or 1100 NE Loop 410, Suite 640 San Antonio, TX 78209 or 301 Junction Highway, Suite 346C Kerrville, TX 78029 or 3532 Bee Cave Road, Suite 100 Austin, TX 78746	Republican Congressman involved in drawing the adopted congressional map
Congressman Pete Sessions	326 Russell Senate Office Building Washington, DC 20510 -0104	Republican Congressman involved in drawing the adopted congressional map
Representative Burt R. Solomons, District 65	Room 1W.11, Capitol P.O. Box 2910 Austin, TX 78768 or 1029 Rosemeade Pkwy., #108 Carrollton, TX 75007	Texas House of Representatives Redistricting (Procedural) Committee
The Honorable Kel Seliger	P.O. Box 12068 Capitol Station Austin, TX 78701 or 410 S. Taylor, Suite 1600 Amarillo, TX 79101 or 401 Austin, Suite 101 Big Spring, TX 79720 or 6 Desta Drive, Suite 3360 Midland, TX 79705 or 4840 E. University, Suite 205 Odessa, TX 79762	Texas Senate Select Committee on Redistricting

Doug Davis, Staff Member for Lt. Gov. Dewhurst	Capitol Station P.O. Box 12068 Austin, Texas 78711	Drew maps on behalf of the Lieutenant Governor
Gerardo Interiano, General Counsel for Speaker Strauss	Room CAP 2W.13, Capitol P.O. Box 2910 Austin, TX 78768	Advisor to Speaker Strauss for redistricting issues
Anthony Gutierrez, Texas Democratic Party Deputy Executive Director	505 W. 12 th Street, Suite 200 Austin, TX 78701	Staff responsible for redistricting matters
Texas Legislative Counsel Staff	Texas Legislative Council 1501 N. Congress Ave. Austin, Texas 78701	Election data and redistricting development facts and suggested maps

IV.

EXHIBIT LIST

TDP reserves the right to admit as exhibits those documents that are being produced by the parties and witnesses now. The general category of those documents are described below. TDP intends to offer the schedules, charts and compilation contained in the attached report as exhibits as well.

CATEGORY	LOCATION
Election and demographic data, draft maps, amendments and other documents relative to redistricting.	Texas Legislative Counsel, State of Texas, and/or Defendants
Census results and data.	United States Department of Commerce
Data and documents concerning incarcerated and released felons.	Texas Department of Criminal Justice
Documents, emails, faxes, draft maps and other correspondence among the Texas Republican Congressional Delegation.	Texas Republican Congressman
Documents, emails, faxes, draft maps and other correspondence concerning redistricting.	Republican Party of Texas
Records of the redistricting proceedings.	Texas Legislature

Documents, emails, faxes, draft maps and other correspondence concerning redistricting.	Governor Rick Perry, Lt., Governor David Dewhurst, Speaker Joe Strauss
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Dated this 8th day of August, 2011.

Respectfully submitted,

By: /s/ Chad W. Dunn
Chad W. Dunn – Attorney In Charge
State Bar No. 24036507
General Counsel
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BRAZIL & DUNN
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ATTORNEY FOR INTERVENOR
TEXAS DEMOCRATIC PARTY AND
BOYD RICHIE, IN HIS CAPACITY AS
CHAIR OF THE TEXAS
DEMOCRATIC PARTY

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2011, I electronically filed the foregoing document with the Clerk of the United States District Court, Western District of Texas, San Antonio Division, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. All attorneys who have not yet registered to receive NEFs have been served via first –class regular mail, postage prepaid and addressed as follows:

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/s/ Chad W. Dunn

Chad W. Dunn